

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION

CARPENTERS' DISTRICT COUNCIL OF  
GREATER ST. LOUIS, et al.,

Plaintiffs,

v.

COLLINS CONTRACTING, INC.,

Defendant.

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)  
) Case No. 4:05CV817SNL  
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)

**STIPULATION FOR ENTRY OF CONSENT JUDGMENT**

Come now the parties and stipulate as follows:

1. Judgment shall be entered in favor of plaintiffs and against defendant in the amount of \$10,966.62, which consists of \$7,855.76 in delinquent contributions owed for Michael Simone for the period of July 1, 2003 through February 17, 2004, \$1,571.15 in liquidated damages and \$1,539.71 in interest.

2. Execution on the judgment amount set forth in paragraph 1, above, shall be stayed so long as defendant complies with paragraphs 3 and 4, below.

3. Defendant shall make payments to plaintiffs pursuant to the following schedule:

- 1) \$456.94 on or before July 15, 2005;
- 2) \$456.94 on or before August 15, 2005;
- 3) \$456.94 on or before September 15, 2005;
- 4) \$456.94 on or before October 15, 2005;
- 5) \$456.94 on or before November 15, 2005;
- 6) \$456.94 on or before December 15, 2005;
- 7) \$456.94 on or before January 15, 2006;

- 8) \$456.94 on or before February 15, 2006;
- 9) \$456.94 on or before March 15, 2006;
- 10) \$456.94 on or before April 15, 2006;
- 11) \$456.94 on or before May 15, 2006;
- 12) \$456.94 on or before June 15, 2006;
- 13) \$456.94 on or before July 15, 2006;
- 14) \$456.94 on or before August 15, 2006;
- 15) \$456.94 on or before September 15, 2006;
- 16) \$456.94 on or before October 15, 2006;
- 17) \$456.94 on or before November 15, 2006;
- 18) \$456.94 on or before December 15, 2006;
- 19) \$456.94 on or before January 15, 2007;
- 20) \$456.94 on or before February 15, 2007;
- 21) \$456.94 on or before March 15, 2007;
- 22) \$456.94 on or before April 15, 2007;
- 23) \$456.94 on or before May 15, 2007; and
- 24) \$456.94 on or before June 15, 2007.

4. Defendant shall submit its reports and contributions to the Carpenters Funds on or before the date due as set forth in the collective bargaining agreement to which defendant is party, or to which defendant becomes party during the period set forth in paragraph 3, above.

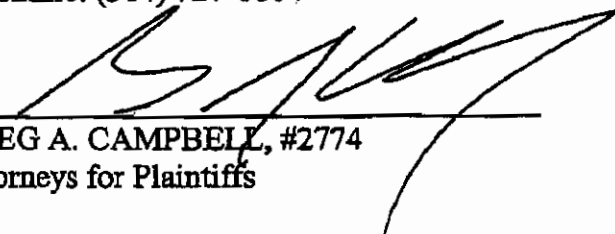
5. If defendant fails to make a payment when due pursuant to paragraph 3 above, or fails to submit its reports and contributions as required by paragraph 4, above, the entire judgment,

less any payments made, shall become immediately due. If defendant complies with paragraph 3 and 4, above, then payment of the amount referenced in paragraph 3 shall satisfy this judgment.

6. The parties acknowledge that this Stipulation is based upon un-audited reports submitted by defendant, and that if plaintiffs discover through an audit of defendant's records that additional amounts are owed, then plaintiffs shall be entitled to pursue the collection of such amounts.

WHEREFORE, the parties stipulate to entry of a consent judgment according to the above terms.

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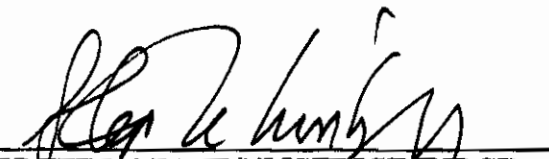
  
\_\_\_\_\_  
GREG A. CAMPBELL, #2774  
Attorneys for Plaintiffs

COLLINS CONTRACTING  
201 Arrowhead Hills Drive  
Fenton, Missouri 63026

By: \_\_\_\_\_

Title: \_\_\_\_\_

SO ORDERED:

  
\_\_\_\_\_  
UNITED STATES DISTRICT JUDGE

Dated: \_\_\_\_\_